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भारत संचार निगम लिमिटेड
(भारत सरकार का उपक्रम)
BHARAT SANCHAR NIGAM LIMITED
(A Govt. of India Enterprise)

To,

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No. BSNLCO-RGLN/29/8/2020-REGLN dated 01-06-2021

Sub: Comments on Supplementary Consultation Paper on **Roadmap to Promote Broadband Connectivity and Enhanced Broadband Speed**.-reg.

Reference: Supplementary Consultation Paper on **Roadmap to Promote Broadband Connectivity and Enhanced Broadband Speed** dated 19-05-2021.

In response to above referred Supplementary Consultation Paper, the comments of BSNL are as below:

Q 1. What should be the approach for incentivizing the proliferation of fixed-line broadband networks? Should it be indirect incentives in the form of exemption of license fee on revenues earned from fixed line broadband services, or direct incentives based on an indisputable metric?

BSNL's Comment:- Approach for incentivizing the proliferation of fixed-line broadband networks should be "**Indirect incentives in the form of exemption of license fee on revenues earned from fixed line broadband services**" and viability funding method.

Q 2. If indirect incentives in the form of exemption of license fee on revenues earned from fixed-line broadband services are to be considered then should this license fee exemption be limited to broadband revenue alone or it should be on complete revenue earned from services delivered through fixed-line networks?

BSNL's Comment:- Landline (voice alone) shall also be included as it is integrated with Fixed Line BB and so revenue separation will not be required.

Q 3. In case of converged wireless and fixed-line products or converged services delivered using the fixed-line networks, how to unambiguously arrive at the revenue on which license fee exemption could be claimed by the licensees?

BSNL's Comment:- Revenue bifurcation shall be done to identification of fixed line revenue (both Voice & Data) and wireless revenue and licensee fee exemption can be sought accordingly.

Q 4. What should be the time period for license fee exemption? Whether this exemption may be gradually reduced or tapered off with each passing year?

BSNL's Comment:- It proposed to provide flat full exemption for 7 years as still lot of investment is required for reaching wireline broadband through FTTH in a good number upto break even point and to reach in all areas.

Q 5. Is there a likelihood of misuse by the licensees through misappropriation of revenues due to the proposed exemption of the License Fee on the revenues earned from fixed-line broadband services? If yes, then how to prevent such misuse? From the revenue assurance perspective, what could be the other areas of concern?

BSNL's Comment:- BSNL has transparent audit mechanism like Statutory audit, P&T Audit and TRAI billing & metering Audit , so there is no issue of misuse by the licensees.

Q 6. How the system to ascertain revenue from fixed-line broadband services needs to be designed to ensure proper verification of operator's revenue from this stream and secure an effective check on the assessment, collection, and proper allocation and accounting of revenue. Further, what measures are required to be put in place to ensure that revenue earned from the other services is not mixed up with revenues earned from fixed-line broadband services in order to claim higher amount of incentive/exemption.

BSNL's Comment:- BSNL has transparent audit mechanism like Statutory audit, P&T Audit and TRAI billing & metering Audit , so there is no issue of misuse by the licensees being above checks.

Q 7. Is there any indisputable metric possible to provide direct incentive for proliferation of fixed-line broadband networks? What would be that indisputable metric? How to ensure that such direct incentives will not be misused by the licensees?

BSNL's Comment:- BSNL does not suggest any direct incentive to customer. BSNL is of view that there should be direct incentive to operator only.

Q 8. What are key issues and challenges in getting access to public places and street furniture for installation of small cells? Kindly provide the State/ City wise details.

BSNL's Comment:- The issues and challenges in getting access to public places and steel furniture are delay in permission, high cost of obtaining permissions and poor maintenance/upkeep of street furniture.

Q 9. How to permit use of public places and street furniture for the effective rollout of 5G networks? Kindly suggest a uniform, simple, and efficient process which can be used by States/ Local-Bodies for granting access to public places and street furniture for installing small cells. Kindly justify your comments.

BSNL's Comment:- Uniform and enforceable policy for allowing access to TSP should be formulated. DoT LSA units should be empowered to play vital role in coordination between local authorities and TSPs.

Q 10. Which all type of channels of communication should be standardized to establish uniform, transparent, and customer friendly mechanisms for publicizing provisioning of service and registration of demand by Licensees?

BSNL's Comment:- Standard practice of BSNL are good enough to handle this.

Q 11. Whether proliferation of fixed-line broadband services can be better promoted by providing Direct Benefit Transfer (DBT) to subscribers of fixed-line broadband services? If no, elucidate the reasons.

BSNL's Comment:- No

Direct Benefit to the user requires ascertaining

1. The cost incurred by operator in service provisioning
2. The service consumption details, bill paid by the customer (as it can vary from area to area for the same service).

All of this information first needs to be flow from operator to regulator / USO and thereafter the customers can be credited with benefit. This can become logistically complex and delays in giving DBT to customers.

Hence operator should be compensated centrally based on the information shared by operators.

Q 12. If answer to Q11 is affirmative, then: 34 i. Should DBT scheme be made applicable to all or a particular segment of fixed-line broadband subscribers? Kindly justify your comments. ii. If you recommend supporting a particular segment of fixed-line broadband subscribers, how to identify such segment of the subscribers? iii. How to administer this scheme? iv. What should be the amount of DBT for each connection? v. What should be the period of offer within which individuals need to register their demand with the service providers? vi. What should be the maximum duration of subsidy for each eligible fixed-line broadband connection?

BSNL's Comment:-NA

Q 13. Any other related issue:

In the unconnected areas where regular optical media cannot be reached and govt. wants to provide broadband services in that areas then it is proposed to make the same feasible through satellite backhaul media. Since the satellite backhaul costs are very high due to large chunk being paid to ISRO, mechanism needs to be devised to reduce this cost to make citizen connected affordable in the far flung unconnected geography

Yours faithfully



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